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*Attorneys for Plaintiffs*

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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION

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SHANNON CAVANAUGH and BRAD  
CAVANAUGH,

Plaintiff,

v.

WOODS CROSS CITY, a Utah municipal  
corporation; DANIEL DAVIS, an individual,

Defendant.

**PLAINTIFFS' RULE 26(a)(2) EXPERT  
DISCLOSURES**

Case No. 1:08cv00032

District Judge Tena Campbell

Magistrate Judge David Nuffer

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Plaintiffs, through their counsel of record, Jones Waldo Holbrook & McDonough PC,  
hereby submit their expert testimony disclosure pursuant to Rule 26(a)(2), Federal Rules of Civil  
Procedure.

1. Dr. Erin Bigler, Ph.D.  
P.O. Box 1968  
Provo, Utah 84603-1968

Dr. Bigler will testify regarding the brain injury that Shannon Cavanaugh suffered  
as a direct result of Defendants' action.

Dr. Bigler's report, curriculum vitae, and history of testimony are attached as  
Exhibit A. Dr. Bigler's rates are a \$3850 retainer and \$275 per hour for trial,  
deposition, arbitration and mediation testimony.

2. Helen Woodard, M.A.  
Reentry Rehabilitation Services, Inc.  
1435 Reed Street  
Lakewood, Colorado 80214

Ms. Woodard will testify regarding Ms. Cavanaugh's vocational rehabilitation, life care plan and life care expenses.

Ms. Woodard's report, curriculum vitae, and testimony list are attached as Exhibit B. Ms. Woodard's rates are \$200 per hour for reports and her staff time is charged at \$156 per hour. Ms. Woodard charges \$1200 for deposition or trial testimony for three hours and \$ 300 per hour for additional time. However, if two hours are set aside, she charges \$900. If one hour is set aside, she charges \$600.

3. Dr. Ian Shepherd, MsD.  
4424 Century Drive  
Murray, Utah 84123

Dr. Shepherd will testify regarding proper Taser deployment procedure and training.

Dr. Shepherd's report, fees, curriculum vitae and testimony list are attached as Exhibit C.

4. David Lundberg  
PO Box 900944  
Sandy, Utah 84090

Mr. Lundberg will testify regarding proper police conduct.

Mr. Lundberg's report, fee schedule and curriculum vitae are attached as Exhibit D. Mr. Lundberg testified in case number 054800027 in the Utah Eighth Judicial District in 2005.

5. Richard Hoffman, CPA/ABV  
Lone Peak Valuation Group  
170 S. Main St. Ste 1075  
Salt Lake City, Utah 84101

Mr. Hoffman will testify concerning Ms. Cavanaugh's economic losses.

Mr. Hoffman's curriculum vitae, testimony list, rate schedule and report are attached as Exhibit E.

DATED this 30th\_ day of March, 2009.

JONES WALDO HOLBROOK & McDONOUGH PC

By: /s/ Kathleen McDonald  
Bret M. Hanna  
Kathleen E. McDonald  
Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 30th\_ day of March, 2009, I caused a true and correct copy of the foregoing Plaintiff's Rule 26 (a)(2) Expert Disclosures by email, upon the following:

Peter Stirba  
Blake Hamilton  
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/s/Kathleen McDonald